

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

In re Provectus Biopharmaceuticals, Inc.
Securities Litigation

Case No. 3:14-cv-00338-PLR-HBG

CLASS ACTION

District Judge Pamela L. Reeves

Magistrate Judge H. Bruce Guyton

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS CERTIFICATION AND PLAN OF ALLOCATION,
AND FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
LITIGATION EXPENSES**

Lead Plaintiff Fawwaz Hamati, by and through his undersigned counsel, hereby moves the Court, pursuant to Federal Rule of Civil Procedure 23(e), and this Court's Order Preliminarily Approving Settlement and Providing for Notice of Proposed Settlement, dated April 7, 2016, for entry of a Judgment approving the Settlement as fair, reasonable and adequate and granting final certification of the Settlement Class, for entry of an order approving the proposed Plan of Allocation as fair and reasonable, and for an entry of an order awarding Attorneys' Fees and Reimbursement of Litigation Expenses.

Lead Plaintiff's motion is based upon: (i) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement, Class Certification and Plan of Allocation; (ii) the Memorandum of Law in Support of Lead Plaintiff's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; (iii) the Declaration of Kara M. Wolke in Support of (A) Lead Plaintiff's Motion for Final Approval of Settlement, Class Certification and Plan Of Allocation, and (B) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; and (iv) all pleadings, records and papers on file herein.

The motion will be heard before the Honorable Pamela L. Reeves, on September 26, 2016, at 10:00 a.m., in Courtroom 3C of the Howard H. Baker, Jr. United States Courthouse, 800 Market Street, Knoxville, Tennessee 37902, or at such other location and time as set by the Court.

Proposed Orders granting the requested relief will be submitted with Lead Plaintiff's reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

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DATED: August 22, 2016

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**PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO EASTERN
DISTRICT OF TENNESSEE LOCAL RULES AND ECF RULES**

I, the undersigned, say:

I am a citizen of the United States and am over the age of 18 and not a party to the within action. My business address is 1925 Century Park East, Suite 2100, Los Angeles, California 90067.

On August 22, 2016, I served the foregoing document by posting the document to the ECF Website of the United States District Court for the Eastern District of Tennessee, for receipt electronically by the parties as listed on the attached Court's ECF Service List.

And on any non-ECF registered parties by U.S. Mail: By placing true and correct copies thereof in individual sealed envelope: with postage thereon fully prepaid, which I deposited with my employer for collection and mailing by the United States Postal Service. I am readily familiar with my employer's practice for the collection and processing of correspondence or mailing with the United States Postal Service. In the ordinary course of business, this correspondence would be deposited by my employer with the United States Postal Service that same day.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 22, 2016, at Los Angeles, California.

s/ Kara M. Wolke

Kara M. Wolke

Mailing Information for a Case 3:14-cv-00338-PLR-HBG Farrah, et al v. Provectus Biopharmaceuticals, Inc., et al (PLR2)

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Manual Notice List

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